

## BILL OF COMPLAINT

RAYMOND W. BALTZELL AND  
 CARRIE M. BALTZELL, HIS WIFE  
 RAYMOND W. BALTZELL, FATHER  
 AND NEXT FRIEND OF DORIS  
 LARUE BALTZELL, INFANT

VS.

DORIS LARUE BALTZELL, INFANT

NO. 17037 EQUITY  
 IN THE CIRCUIT COURT  
 FOR FREDERICK COUNTY  
 IN EQUITY

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TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of Raymond W. Baltzell and Carrie M. Baltzell, his wife, and Raymond W. Baltzell, father and next friend of Doris Larue Baltzell, infant, by W. Jerome Offutt, their solicitor, respectfully represents unto your Honorable Court:

FIRST: That on the 29th day of June 1945, Newell B. Devilbiss and Kathleen P. Devilbiss, his wife, conveyed to Raymond W. Baltzell, Carrie M. Baltzell, his wife, and Doris L. Baltzell, his daughter, as joint tenants a certain parcel of land situated in the East side of Unionville, Frederick County, Maryland, containing one and one-fourth acres and five square rods of land, more or less, by Deed recorded in Liber 450, folio 198, etc., One of the Land Records of Frederick County, the original Deed being filed herewith marked "Exhibit A" to this Petition and prayed to be considered a part thereof as well as all other Exhibits to be filed herewith.

SECOND: That the said Doris Larue Baltzell is an infant under the age of 21 years, having been born on March 8, 1933.

THIRD: That said property is owned by Raymond W. Baltzell, Carrie M. Baltzell, his wife, and Doris Larue Baltzell as joint tenants and that said real estate is not susceptible of partition or division among the parties interested therein without loss or injury.

FOURTH: That all of the said parties reside together and the said Raymond W. Baltzell and Carrie M. Baltzell, his wife, have leased a farm whereby the above described premises will be vacated by them and of no further use to them for occupancy.

FIFTH: That on the 22nd day of February, 1951, your Petitioners Raymond W. Baltzell and Carrie M. Baltzell, his wife and Raymond W. Baltzell, father and natural Guardian of Doris Larue Baltzell, infant, entered into a Contract